

**EXHIBIT B**

**Copy of All Filings with State Court**

## 261st District Court

## Case Summary

Case No. D-1-GN-18-001835

HESLIN V JONES

§  
§Location: 261st District Court  
Filed on: 04/16/2018

## Case Information

Case Type: Defamation  
Case Status: 11/06/2019 Open

## Assignment Information




## Current Case Assignment

Case Number D-1-GN-18-001835  
Court 261st District Court  
Date Assigned 04/16/2018

## Party Information

<b>Defendant</b>	<b>FREE SPEECH SYSTEMS LLC</b>	<b>REYNAL, FEDERICO ANDINO</b> <i>Retained</i>
		<b>Blott, Jacquelyn W</b> <i>Retained</i>
	<b>INFOWARS LLC</b>	<b>REYNAL, FEDERICO ANDINO</b> <i>Retained</i>
		<b>Blott, Jacquelyn W</b> <i>Retained</i>
	<b>JONES, ALEX E</b>	<b>Blott, Jacquelyn W</b> <i>Retained</i>
		<b>REYNAL, FEDERICO ANDINO</b> <i>Retained</i>
	<b>SHROYER, OWEN</b>	<b>Blott, Jacquelyn W</b> <i>Retained</i>

## Case Events

04/16/2018	ASM:GN CIVIL PETITION <i>Event Code: 600 Adjmt Amount: 307.00</i>
04/16/2018	 ORIGINAL PETITION/APPLICATION <i>PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE Event Code: 5050</i>
04/16/2018	NEW:ORIGINAL PETITION/APPL (OCA) <i>Event Code: 4500</i>
04/23/2018	 LETTER/EMAIL/CORR <i>LETTER REQUESTING ISSUANCE (CITATION) Event Code: 5414</i>
04/27/2018	ASM:CITATION ISSUE <i>Event Code: 702 Adjmt Amount: 32.00</i>
06/18/2018	 ANSWER

## Case Summary

**Case No. D-1-GN-18-001835**

*DEFENDANTS' ORIGINAL ANSWER Event Code: 5150*

Party: Defendant JONES, ALEX E

06/27/2018



LETTER/EMAIL/CORR

*VACATION LETTER Event Code: 5414*

06/28/2018



LETTER/EMAIL/CORR

*VACATION LETTER Event Code: 5414*

06/29/2018



LETTER/EMAIL/CORR

*VACATION LETTER Event Code: 5414*

Party: Defendant JONES, ALEX E

06/29/2018



NTC:ATTORNEY/COUNSEL

*SUBSTITUTION OF COUNSEL Event Code: 5550*

Party: Defendant JONES, ALEX E

07/13/2018



AMENDED/SUPPLEMENTED ANSWER

*DEFENDANTS' FIRST AMENDED ANSWER Event Code: 5152*

Party: Defendant JONES, ALEX E

07/13/2018



MOTION

*DEFENDANTS' MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT Event Code: 5265*

Party: Defendant JONES, ALEX E

07/19/2018



NOTICE

*NOTICE OF HEARING Event Code: 5554*

Party: Defendant JONES, ALEX E

07/23/2018



LETTER/EMAIL/CORR

*LETTER FROM: MARK C. ENOCH Event Code: 5414*

Party: Defendant JONES, ALEX E

08/10/2018



ASSIGNMENT BY PRESIDING JUDGE

*ASSIGNMENT BY PRESIDING JUDGE Event Code: 5423*

08/16/2018



LETTER/EMAIL/CORR

*LETTER FROM SCOTT H JENKINS JUDGE 53RD DISTRICT COURT TRAVIS COUNTY, TEXAS Event Code: 5414*

08/17/2018



MOTION

*PLAINTIFF'S MOTION FOR SANCTIONS FOR INTENTIONAL DESTRUCTION OF EVIDENCE Event Code: 5265*

08/17/2018



MOTION

*PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY IN AID OF PLAINTIFF'S RESPONSE TO DEFENDANTS' TCPA MOTION Event Code: 5265*

08/21/2018



LETTER/EMAIL/CORR

*LETTER FROM MARK C. ENOCH Event Code: 5414*

Party: Defendant JONES, ALEX E

08/23/2018



RESPONSE

*DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR SANCTIONS AND MOTION FOR EXPEDITED DISCOVERY Event Code: 5153*

Party: Defendant JONES, ALEX E

08/27/2018



## Case Summary

Case No. D-1-GN-18-001835

### RESPONSE

*PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT* Event Code: 5153

08/27/2018

### AFFIDAVIT

*SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT* Event Code: 5401  
Party: Defendant JONES, ALEX E

08/27/2018

### AMENDED/SUPPLEMENTED ANSWER

*DEFENDANTS' FIRST AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR SANCTIONS AND MOTION FOR EXPEDITED DISCOVERY AND DEFENDANTS' MOTION FOR SANCTIONS* Event Code: 5152  
Party: Defendant JONES, ALEX E

08/28/2018

### AFFIDAVIT

*SUPPLEMENTAL AFFIDAVITS IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT* Event Code: 5482  
Party: Defendant JONES, ALEX E

08/28/2018

### AFFIDAVIT

*SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF DEFENDANTS' FIRST AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR SANCTIONS AND MOTION FOR EXPEDITED DISCOVERY AND DEFENDANTS' MOTION FOR SANCTIONS* Event Code: 5482  
Party: Defendant JONES, ALEX E

08/29/2018

### OBJECTIONS

*DEFENDANTS' OBJECTIONS TO PLAINTIFF'S EVIDENCE SUBMITTED IN RESPONSE TO DEFENDANTS' MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT* Event Code: 5156  
Party: Defendant JONES, ALEX E

08/29/2018

### OTHER

*DEFENDANTS' FIRST SUPPLEMENT TO MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT* Event Code: 5415  
Party: Defendant JONES, ALEX E

08/29/2018

### AFFIDAVIT

*SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF DEFENDANTS' FIRST AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR SANCTIONS AND MOTION FOR EXPEDITED DISCOVERY AND DEFENDANTS' MOTION FOR SANCTIONS* Event Code: 5401  
Party: Defendant JONES, ALEX E

08/29/2018

### AMENDED/SUPPLEMENTED ANSWER

*DEFENDANTS' SECOND AMENDED ANSWER* Event Code: 5152  
Party: Defendant JONES, ALEX E

08/30/2018

### MOTION

*DEFENDANTS' SECOND SUPPLEMENT TO MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT* Event Code: 5265  
Party: Defendant JONES, ALEX E

08/30/2018

### AFFIDAVIT

*SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF DEFENDANTS' FIRST AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR SANCTIONS AND MOTION FOR EXPEDITED DISCOVERY AND DEFENDANTS' MOTION FOR SANCTIONS* Event Code: 5401

## Case Summary

Case No. D-1-GN-18-001835

Party: Defendant JONES, ALEX E

08/30/2018



LETTER/EMAIL/CORR

*LETTER Event Code: 5414*

Party: Defendant JONES, ALEX E

08/30/2018



LETTER/EMAIL/CORR

*LETTER/EMAIL/CORR Event Code: 5414*

08/31/2018



ORDER

*ORDER ON PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY IN AID O F PLAINTIFF'S RESPONSE TO DEFENDANTS' TCPA MOTION Event Code: 8225*

09/11/2018



OTHER

*DEFENDANTS' REQUEST FOR RULINGS ON TIMELY FILED OBJECTIONS TO PLAINTIFF'S EVIDENCE Event Code: 5415*

Party: Defendant JONES, ALEX E

09/14/2018



LETTER/EMAIL/CORR

*LETTER FROM MARK C. ENOCH Event Code: 5414*

Party: Defendant JONES, ALEX E

09/25/2018



OTHER

*DEFENDANTS' SECOND RENEWED REQUEST FOR RULINGS ON TIMELY FILED OBJECTIONS TO PLAINTIFF'S EVIDENCE Event Code: 5415*

Party: Defendant JONES, ALEX E

09/28/2018



MOTION

*DEFENDANTS' MOTION FOR PROTECTIVE/CONFIDENTIALITY ORDER Event Code: 5265*

Party: Defendant JONES, ALEX E

10/01/2018



MTN:MODIFY, REDUCE, ENFO,CONTE

*PLAINTIFF'S MOTION FOR CONTEMPT UNDER RULE 215 Event Code: 5261*

10/02/2018



NOTICE OF APPEAL

*DF-1 NOTICE OF APPEAL Event Code: 5553*

Party: Defendant JONES, ALEX E

10/02/2018



LETTER/EMAIL/CORR

*LETTER TO JUDGE JENKINS Event Code: 5414*

Party: Defendant JONES, ALEX E

10/03/2018

ASM:CV MOTION FOR CONTEMPT

*Event Code: 635 Adjmt Amount: 80.00*

10/03/2018



LETTER/EMAIL/CORR

*LETTER FROM 3RD COA Event Code: 5414*

10/10/2018



DESIGNATION CLRKS/REPORTR REC

*DF-1 DESIGNATION FOR COURT REPORTER'S RECORD Event Code: 5409*

Party: Defendant JONES, ALEX E

10/10/2018



DESIGNATION CLRKS/REPORTR REC

*DF-1 DESIGNATION FOR CLERK'S RECORD Event Code: 5409*

Party: Defendant JONES, ALEX E

10/10/2018

ASM:CLERKS RECORD

*Event Code: 939 Adjmt Amount: 3192.00*

**Case Summary****Case No. D-1-GN-18-001835**

Party: Defendant JONES, ALEX E

10/10/2018



MSF:BILL OF COST FOR CLERK REC

*Form Number B03-2686 Issued by HAMILTON LYNDIA SELINA (102) MSF:BILL OF COST FOR C Event Code: 102*

Party: Defendant JONES, ALEX E

10/11/2018



CLERKS RECORD TRANSMITTAL

*FILED CLERK'S RECORD BY 3RD COA / HAND DELIVERED Event Code: 5606*

10/11/2018



CLERKS RECORD TRANSMITTAL

*FILED BY 3RD COA EXHIBITS TO BE INCLUDED WITH CLERK'S RECORD /// HAND DELIVERED Event Code: 5606*

10/15/2018



LETTER/EMAIL/CORR

*LETTER TO COURT OPERATIONS OFFICER Event Code: 5414*

Party: Defendant JONES, ALEX E

10/26/2018



LETTER/EMAIL/CORR

*LETTER FROM 3RD COA Event Code: 5414*

10/26/2018



LETTER/EMAIL/CORR

*LETTER FROM 3RD COA Event Code: 5414*

10/26/2018



LETTER/EMAIL/CORR

*LETTER FROM 3RD COA Event Code: 5414*

11/06/2018



SUPPL DESIGNATION CLERK RECORD

*DF-1 DESIGNATION FOR SUPPLEMENTAL CLERK'S RECORD Event Code: 5441*

Party: Defendant JONES, ALEX E

11/07/2018

ASM:CLERKS RECORD

*Event Code: 939 Adjmt Amount: 11.00*

Party: Defendant JONES, ALEX E

11/07/2018



MSF:BILL OF COST FOR CLERK REC

*Form Number B03-2709 Issued by HAMILTON LYNDIA SELINA (102) MSF:BILL OF COST FOR C Event Code: 102*

Party: Defendant JONES, ALEX E

12/07/2018



LETTER/EMAIL/CORR

*VACATION LETTER Event Code: 5414*

12/07/2018



MSF:2ND NOT BILL CLERKS RECORD

*Form Number B04-162 Issued by HELEN (103) MSF:2ND NOT BILL CLERKS RECOR Event Code: 103*

Party: Defendant JONES, ALEX E

12/10/2018



CLERKS RECORD TRANSMITTAL

*TAMES RECORD SUBMISSION FOR SUPPLEMENTAL CLERK'S RECORD Event Code: 5606*

12/11/2018



LETTER/EMAIL/CORR

*LETTER FROM 3RD COA Event Code: 5414*

06/26/2019



PLEADING

*PLAINTIFF'S FIRST AMENDED PETITION Event Code: 5054*

08/08/2019



PLEADING

*PLAINTIFF'S THIRD AMENDED PETITION Event Code: 5054*

08/30/2019



ORD:JUDGMENT

# Case Summary

**Case No. D-1-GN-18-001835**

OPINION AND JUDGMENT FROM 3RD COA Event Code: 8216

09/30/2019



RESPONSE

PLAINTIFF'S SUPPLEMENTAL RESPONSE TO DEFENDANTS' MOTION TO DISMISS UNDER THE TEXAS CITIZENS PARTICIPATION ACT Event Code: 5153

10/01/2019



ANSWER

DEFENDANTS' STIPULATION AND RESPONSE TO PLAINTIFF'S THIRD AMENDED PETITION Event Code: 5150  
Party: Defendant JONES, ALEX E

10/18/2019



ORDER

ORDER ON PLAINTIFF'S MOTION FOR CONTEMPT UNDER RULE 215 AND DEFENDANTS' MOTION TO DISMISS UNDER THE TCPA Event Code: 8225

11/04/2019



MTN:SUB & OR WITHDRAW COUNSEL

MOTION FOR SUBSTITUTION OF COUNSEL Event Code: 5268  
Party: Defendant JONES, ALEX E

11/06/2019



NTC:ATTORNEY/COUNSEL

NOTICE OF APPEARANCE OF COUNSEL Event Code: 5550  
Party: Defendant JONES, ALEX E

11/07/2019



NOTICE OF APPEAL

DEFENDANTS' NOTICE OF INTERLOCUTORY APPEAL Event Code: 5553  
Party: Defendant JONES, ALEX E

11/07/2019



DESIGNATION CLERKS/REPORTER REC

DESIGNATION OF COURT REPORTER'S RECORD Event Code: 5409  
Party: Defendant JONES, ALEX E

11/07/2019



DESIGNATION CLERKS/REPORTER REC

DESIGNATION OF FILINGS FOR CLERK'S RECORD Event Code: 5409  
Party: Defendant JONES, ALEX E

11/08/2019

ASM:CLERKS RECORD

Event Code: 939 Adjmt Amount: 3303.00  
Party: Defendant JONES, ALEX E

11/08/2019



MSF:BILL OF COST FOR CLERK REC

Form Number B03-2966 Issued by HAMILTON LYNDIA SELINA (102) MSF:BILL OF COST FOR C Event Code: 102  
Party: Defendant JONES, ALEX E

11/12/2019



LETTER/EMAIL/CORR

LETTER FROM 3RD COA Event Code: 5414

11/13/2019



DESIGNATION CLERKS/REPORTER REC

REQUEST FOR COURT REPORTER'S RECORD Event Code: 5409  
Party: Defendant JONES, ALEX E

11/18/2019



LETTER/EMAIL/CORR

RECORD SUBMISSION FOR CLERK'S RECORD CHAND DELIVERED TO 3RD COA Event Code: 5414

11/19/2019



UNSIGNED/PROPOSED ORDER

UNSIGNED ORDER Event Code: 5422

11/19/2019




LETTER/EMAIL/CORR

LETTER FROM 3RD COA Event Code: 5414


**Case Summary****Case No. D-1-GN-18-001835**

12/04/2019  ORD:MANDATE  
MANDATE FROM 3RD COA Event Code: 8218

03/25/2020  ORD:JUDGMENT  
MEMORANDUM OPINION AND JUDGMENT FROM 3RD COA Event Code: 8216

06/26/2020  LETTER/EMAIL/CORR  
LETTER/EMAIL/CORR Event Code: 5414


07/06/2020  LETTER/EMAIL/CORR  
LETTER/EMAIL/CORR FROM THIRD COURT OF APPEALS Event Code: 5414

01/22/2021  OTHER  
LETTER FROM THE SUPREME COURT OF TEXAS Event Code: 5415

02/19/2021  OTHER  
LETTER TO SUPREME COURT OF TEXAS Event Code: 5415

02/23/2021  OTHER  
LETTER TO SUPREME COURT OF TEXAS Event Code: 5415

02/24/2021  OTHER  
LETTER FROM SUPREME COURT OF TEXAS Event Code: 5415

03/09/2021  ASSIGNMENT BY PRESIDING JUDGE  
ASSIGNMENT LETTER FROM JUDGE LIVINGSTON TO COUNSEL Event Code: 5423

03/10/2021  ASSIGNMENT BY PRESIDING JUDGE  
ASSIGNMENT BY PRESIDING JUDGE Event Code: 5423

03/11/2021  OTHER  
LETTER TO 3RD COA Event Code: 5415

03/11/2021  OTHER  
LETTER FROM JUDGE GUERRA GAMBLE Event Code: 5415

04/16/2021  OTHER  
LETTER FROM 3RD COA Event Code: 5415

04/20/2021  OTHER  
LETTER TO MR GAUDIN FROM JUDGE GUERRA GAMBLE Event Code: 5415

04/27/2021  NOTICE  
NOTICE OF APPEARANCE ON BEHALF OF DEFENDANTS Event Code: 5554  
Party: Defendant JONES, ALEX E

04/27/2021  MOTION  
DEFENDANTS? UNOPPOSED MOTION FOR SUBSTITUTION OF COUNSEL AND WITHDRAWAL OF COUNSEL Event Code: 5265  
Party: Defendant JONES, ALEX E

05/14/2021  OTHER  
MEDIA REQUEST Event Code: 5415

06/02/2021  OTHER  
LETTER FROM JUDGE GAMBLE Event Code: 5415

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## Case Summary

Case No. D-1-GN-18-001835

06/03/2021



OTHER

*LETTER FROM JUDGE GUERRA GAMBLE Event Code: 5415*

06/04/2021



ORDER

*MANDATE FROM 3RD COA Event Code: 8225*

06/15/2021



MOTION

*DEFENDANTS' AMENDED UNOPPOSED MOTION FOR SUBSTITUTION OF COUNSEL AND WITHDRAWAL OF COUNSEL Event Code: 5265*

Party: Defendant JONES, ALEX E

06/15/2021



OTHER

*UNSIGNED ORDER/PROPOSED ORDER Event Code: 5415*

Party: Defendant JONES, ALEX E

06/21/2021



ORDER

*ORDER GRANTING DEFENDANTS' AMENDED UNOPPOSED MOTION FOR SUBSTITUTION OF COUNSEL AND WITHDRAWAL OF COUNSEL Event Code: 8225*

07/06/2021



MOTION

*AGREED MOTION TO ENTER LEVEL 3 SCHEDULING ORDER Event Code: 5265*

07/06/2021



MOTION

*OPPOSED MOTION FOR PRO HAC VICE ADMISSION OF MARC J. RANDAZZA Event Code: 5265*

07/06/2021



MOTION

*OPPOSED MOTION FOR PRO HAC VICE ADMISSION OF MARC J. RANDAZZA Event Code: 5265*

Party: Defendant JONES, ALEX E

07/06/2021



OTHER

*UNSIGNED ORDER/PROPOSED ORDER Event Code: 5415*

Party: Defendant JONES, ALEX E

07/06/2021



MOTION

*PLAINTIFF'S SECOND MOTION FOR CONTEMPT UNDER RULE 215 Event Code: 5265*

07/07/2021

ASM:CV MOTION FOR CONTEMPT

*Event Code: 635 Adjmt Amount: 80.00*

07/07/2021



OTHER

*NON-PARTY AMOS PICTURES, LTD.'S REQUEST FOR ORDER TO ALLOW RECORDING AND BROADCASTING OF COURT PROCEEDINGS Event Code: 5415*

07/12/2021



ORDER

*ORDER OF CONSOLIDATION Event Code: 8225*

07/12/2021



ORDER

*LEVEL 3 SCHEDULING ORDER Event Code: 8225*

07/19/2021



ORDER

*ORDER ALLOWING RECORDING AND BROADCASTING OF COURT PROCEEDINGS Event Code: 8225*

07/23/2021



ANSWER

*PLAINTIFFS' RESPONSE TO MOTION FOR PRO HAC VICE ADMISSION Event Code: 5150*

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## Case Summary

Case No. D-1-GN-18-001835

07/30/2021



ANSWER

*REPLY IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION OF MAR C J. RANDAZZA Event Code: 5150*

08/02/2021



ANSWER

*PLAINTIFFS? SUPPLEMENTAL RESPONSE TO MOTION FOR PRO HAC VICE REGARDING WITNESS TAMPERING IN THIS LAWSUIT Event Code: 5150*

08/02/2021



ANSWER

*PLAINTIFFS? SUPPLEMENTAL RESPONSE TO MOTION FOR PRO HAC VICE REGARDING FALSE ACCUSATIONS AGAINST PLAINTIFFS? COUNSEL Event Code: 5150*

08/09/2021



OTHER

*NEIL HESLINS 2ND SUPPLEMENTAL BRIEF ON DEFAULT SANCTIONS CONCERNING AUGUST 6 2021 ORDERS IN LAFFERTY Event Code: 5415*

08/16/2021 Converted Event

08/17/2021



MOTION

*SUPPLEMENT TO MOTION FOR PRO HAC VICE ADMISSION OF MARC J. RANDAZZA Event Code: 5265*

08/18/2021



NOTICE

*NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS Event Code: 5554*

08/18/2021



ANSWER

*PLAINTIFFS? RESPONSE TO DEFENDANTS? SUPPLEMENT TO MOTION FOR PRO HAC VICE ADMISSION Event Code: 5150*

08/19/2021



MOTION

*PLAINTIFFS' MOTION FOR PROTECTION REGARDING IN CAMERA REVIEW Event Code: 5265*

08/30/2021 Converted Event

08/30/2021 Converted Event

08/30/2021



ANSWER

*DEFENDANTS' RESPONSE TO PLAINTIFF'S SUPPLEMENTAL BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT Event Code: 5150*

Party: Defendant JONES, ALEX E

08/30/2021



ANSWER

*DEFENDANTS? RESPONSE TO PLAINTIFF'S SECOND MOTION FOR CONTEMPT UNDER RULE 215 Event Code: 5150*

Party: Defendant JONES, ALEX E

08/31/2021



ORDER

*ORDER REGARDING PROTOCOL FOR IN CAMERA REVIEW Event Code: 8225*

08/31/2021



ORDER

*ORDER DENYING MOTION FOR PRO HAC VICE ADMISSION OF MARC J RA NDAZZA Event Code: 8225*

09/01/2021



NOTICE

*PLAINTIFFS' NOTICE OF FILING DECLARATION REGARDING ATTORNEYS ' FEES Event Code: 5554*

09/08/2021



ANSWER

*DEFENDANTS? OBJECTIONS AND RESPONSE TO PLAINTIFFS? DECLARATION REGARDING ATTORNEYS? FEES Event Code:*

# Case Summary

Case No. D-1-GN-18-001835

5150

Party: Defendant JONES, ALEX E

09/10/2021



ANSWER

*PLAINTIFFS? RESPONSE TO DEFENDANTS? OBJECTIONS TO DECLARATIO N REGARDING ATTORNEYS? FEES Event Code: 5150*

09/15/2021



MOTION

*PLAINTIFFS? UNOPPOSED MOTION FOR PROTECTIVE ORDER OF CONFIDENTIALITY Event Code: 5265*

09/15/2021

MOTION

*PLAINTIFFS? UNOPPOSED MOTION FOR PROTECTIVE ORDER OF CONFIDENTIALITY Event Code: 5265*

09/15/2021



MOTION

*PLAINTIFF?S MOTION TO COMPEL RESPONSES TO SECOND SET OF DISCOVERY REQUESTS AND MOTION FOR SANCTIONS Event Code: 5265*

09/15/2021



MOTION

*PLAINTIFFS? MOTION FOR PROTECTION REGARDING MARC RANDAZZA Event Code: 5265*

09/15/2021



MOTION

*PLAINTIFFS? MOTION FOR LEAVE TO SERVE NET WORTH DISCOVERY Event Code: 5265*

09/15/2021



NOTICE

*PLAINTIFFS? NOTICE REGARDING STATUS OF DISCOVERY Event Code: 5554*

09/15/2021



OTHER

*PLAINTIFF'S DESIGNATION OF EXPERTS Event Code: 5415*

09/27/2021



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER ON PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT*

Party 2: Defendant JONES, ALEX E

10/05/2021



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER ON ATTORNEYS FEES FOR PLAINTIFFS MOTIONS FOR SANCTIONS*

10/07/2021



RECEIPT OF EXHIBITS

*Event Code : 5411*

10/11/2021



NOTICE

*NOTICE OF DELIVERY RE: CONTEMPORARY CARE PSYCHIATRIC CENTERS OF EXCELLENCE (MEDICAL/PSYCHIATRIC)*

10/11/2021



NOTICE

*NOTICE OF DELIVERY RE: CONTEMPORARY CARE PSYCHIATRIC CENTERS OF EXCELLENCE (MEDICAL/PSYCHIATRIC)*

10/22/2021



ANSWER

*DEFENDANTS RESPONSE TO PLAINTIFF S MOTION TO COMPEL RESPONSES TO SECOND SET OF DISCOVERY REQUESTS AND MOTION FOR SANCTIONS*

10/22/2021



OTHER

*UNSIGNED ORDER*

10/22/2021



ANSWER

*DEFENDANTS RESPONSE TO PLAINTIFFS MOTION TO CONSOLIDATE*

## Case Summary

Case No. D-1-GN-18-001835

10/22/2021  OTHER  
*PROPOSED ORDER*

10/25/2021  ANSWER  
*DEFENDANTS RESPONSE TO PLAINTIFFS MOTION FOR LEAVE TO CONDUCT NET WORTH DISCOVERY*

10/25/2021  OTHER  
*UNSIGNED PROPOSED ORDER*

10/25/2021  ANSWER  
*DEFENDANTS RESPONSE TO PLAINTIFFS MOTION FOR PROTECTION REGARDING MARC RANDAZZA*

10/25/2021  OTHER  
*UNSIGNED PROPOSED ORDER*

10/27/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*AMENDED ORDER ON PLAINTIFFS MOTION FOR DEFAULT JUDGMENT AND 2ND MOTION FOR CONTEMPT*  
Party 2: Defendant FREE SPEECH SYSTEMS LLC;  
Defendant INFOWARS LLC;  
Defendant JONES, ALEX E;  
Defendant SHROYER, OWEN

11/05/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON PLAINTIFFS MOTION FOR LEAVE TO SERVE NEW WORTH DISCOVERY*

11/10/2021  OTHER  
*LETTER FROM 3RD COA*

11/17/2021  OTHER  
*LETTER FROM 3RD COA*

11/17/2021  OTHER  
*MEMORANDUM OPINION FROM 3RD COA*

11/30/2021  OTHER  
*RULE 203 CERTIFICATION - MUELLER, CARL, F., M.D., MPH, M.S., F.A.P.A. (Medical/Psychiatric)*

11/30/2021  OTHER  
*RULE 203 CERTIFICATION - MUELLER, CARL, F., M.D., MPH, M.S., F.A.P.A. (Billing)*

11/30/2021  OTHER  
*RULE 203 CERTIFICATION - CROUCH, MICHAEL, W., LCSW (Medical/Psychiatric)*

12/03/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON MOTION FOR PROTECTIVE ORDER OF CONFIDENTIALITY*

12/13/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON PLAINTIFF'S MOTION FOR PROTECTION REGARDING MARC RANDAZZA*

12/13/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON PLAINTIFFS' MOTION TO CONSOLIDATE*

12/13/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON PLAINTIFFS' MOTION TO CONSOLIDATE*

12/13/2021  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

## Case Summary

**Case No. D-1-GN-18-001835**

ORDER ON PLAINTIFF'S MOTION FOR PROTECTION REGARDING MARC RANDAZZA

12/27/2021



MOTION

*PLAINTIFFS MOTION FOR SANCTIONS REGARDING CORPORATE DEPOSITION*

12/30/2021



MOTION

*DEFENDANT, OWEN SHROYER S, MOTION FOR RECONSIDERATION OF THE COURT S ORDER GRANTING A LIABILITY DEFAULT JUDGMENT ON PLAINTIFF S SECOND MOTION FOR CONTEMPT UNDER RULE 215*

Party: Defendant SHROYER, OWEN

12/30/2021



OTHER

*EXHIBIT 1 TRANSCRIPT OF 8/31/21 HEARING*

12/30/2021



OTHER

*PROPOSED ORDER*

12/30/2021



MOTION

*DEFENDANT, ALEX JONES S, MOTION FOR RECONSIDERATION OF THE COURT S ORDER GRANTING A LIABILITY DEFAULT JUDGMENT ON PLAINTIFF S SECOND MOTION FOR CONTEMPT UNDER RULE 215 AND MOTION FOR DEFAULT JUDGMENT*

Party: Defendant JONES, ALEX E

Party 2: Attorney Reeves, Bradley Jordan

12/30/2021



OTHER

*PROPOSED ORDER*

12/31/2021



MOTION

*DEFENDANTS, FREE SPEECH SYSTEMS, LLC S AND INFOWARS, LLC S, MOTION FOR RECONSIDERATION OF THE COURT S ORDER GRANTING A LIABILITY DEFAULT JUDGMENT ON PLAINTIFF S SECOND MOTION FOR CONTEMPT UNDER RULE 215 AND MOTION FOR DEFAULT JUDGMENT*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC

12/31/2021



OTHER

*EXHIBIT 1-TRANSCRIPT OF AUGUST 31,2021 HEARING*

12/31/2021



OTHER

*EXHIBIT 2-DECLARATION OF ALEX JONES*

12/31/2021



OTHER

*PROPOSED ORDER*

01/04/2022



MOTION

*DEFENDANTS MOTION TO EXCLUDE PLAINTIFFS EXPERTS, FRED ZIPP AND BECCA LEWIS*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC;

Defendant JONES, ALEX E;

Defendant SHROYER, OWEN

Party 2: Attorney Reeves, Bradley Jordan

01/04/2022



OTHER

*EXHIBIT 1 - EXHIBITS TO MOTION TO EXCLUDE PLAINTIFFS' EXPERTS*

01/05/2022



OTHER

*RULE 203 CERTIFICATE-CROUCH, MICHAEL, W., LCSW*

01/05/2022



## Case Summary

Case No. D-1-GN-18-001835

OTHER

*NON-PARTY MEDIA VERITE S UNOPPOSED REQUEST FOR ORDER TO ALLOW RECORDING AND BROADCASTING OF COURT PROCEEDINGS*

01/05/2022



OTHER

*LETTER TO JUDGE LIVINGSTON*

01/07/2022



ANSWER

*DEFENDANT, FREE SPEECH SYSTEMS, LLC S, RESPONSE IN OPPOSITION TO PLAINTIFFS MOTION FOR SANCTIONS REGARDING CORPORATE REPRESENTATIVE DEPOSITION*

Party: Defendant FREE SPEECH SYSTEMS LLC

Party 2: Attorney Blott, Jacquelyn W

01/07/2022



OTHER

*PROPOSED ORDER*

01/11/2022



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER ALLOWING RECORDING AND BROADCASTING OF COURT PROCEEDINGS*

01/11/2022



NOTICE

*NOTICE OF APPEARANCE AND DESIGNATION OF LEAD COUNSEL*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC;

Defendant JONES, ALEX E

01/12/2022



MOTION

*DEFENDANTS MOTION FOR CONTEMPT AND SANCTIONS*

Party: Defendant JONES, ALEX E

01/24/2022



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER OF CONSOLIDATION*

01/24/2022



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER ON PLAINTIFFS' MOTION FOR SANCTIONS REGARDING CORPORATE DEPOSTION*

02/01/2022



MOTION

*PLAINTIFFS' MOTION FOR SANCTIONS UNDER RULE 215.4 RELATING TO REQUESTS FOR ADMISSION*

Party 2: Attorney Bankston, Mark DuQuesnay

02/08/2022



NOTICE

*NOTICE OF FILING OF DECLARATION ON ATTORNEY S FEES*

02/08/2022



NOTICE

*NOTICE OF FILING OF DECLARATION ON ATTORNEY'S FEES*

02/09/2022



NOTICE

*NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE*

02/10/2022



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER ON MOTIONS TO COMPEL RESPONSES TO SECOND SET OF DISCOVERY REQUESTS AND MOTIONS FOR SANCTIONS*

02/17/2022



MOTION

*UNOPPOSED MOTION FOR WITHDRAWAL OF COUNSEL*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC;

Defendant JONES, ALEX E;

Defendant SHROYER, OWEN

## Case Summary

Case No. D-1-GN-18-001835

02/17/2022



OTHER

*PROPOSED ORDER*

02/22/2022



MOTION

*MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC;

Defendant JONES, ALEX E;

Defendant SHROYER, OWEN

Party 2: Attorney Blott, Jacquelyn W

02/22/2022



OTHER

*PROPOSED ORDER*

02/25/2022



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER ON ATTORNEYS FEES FOR MOTIONS TO COMPEL RESPONSES TO SECOND SET OF DISCOVERY REQUESTS AND  
MOTIONS FOR SANCTIONS*

02/25/2022



ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)

*ORDER GRANTING UNOPPOSED MOTION FOR WITHDRAWAL OF COUNSEL*

Party: Defendant JONES, ALEX E

02/25/2022



NOTICE

*NOTICE OF APPEARANCE OF ADDITIONAL COUNSEL*

02/25/2022



NOTICE

*NOTICE OF APPEARANCE OF ADDITIONAL COUNSEL*

Party 2: Attorney Moshenberg, Avishay

03/01/2022



ANSWER

*PLAINTIFFS RESPONSE TO NORMAN PATTIS MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE*

Party 2: Attorney Moshenberg, Avishay

03/01/2022



ANSWER

*PLAINTIFFS RESPONSE TO MOTION FOR CONTEMPT AND SANCTIONS*

Party 2: Attorney Moshenberg, Avishay

03/04/2022



MOTION

*PLAINTIFFS MOTION FOR SANCTIONS REGARDING CORPORATE DEPOSITION*

03/04/2022



MOTION

*PLAINTIFFS MOTION FOR LEAVE TO DESIGNATE EXPERT ON NET WORTH*

03/08/2022



NOTICE

*NOTICE OF APPEARANCE*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC;

Defendant JONES, ALEX E

Party 2: Attorney REYNAL, FEDERICO ANDINO

03/08/2022



NOTICE

*AMENDED NOTICE OF APPEARANCE*

Party: Defendant FREE SPEECH SYSTEMS LLC;

Defendant INFOWARS LLC;

Defendant JONES, ALEX E

Party 2: Attorney REYNAL, FEDERICO ANDINO

## Case Summary

Case No. D-1-GN-18-001835

03/08/2022  ANSWER  
*DEFENDANTS' RESPONSE TO PLAINTIFS' MOTION FOR SANCTIONS REGARDING CORPORATE DEPOSITION*

03/08/2022  OTHER  
*EXHIBIT A TO DEFENDANTS' RESPONSE TO MOTION FOR SANCTIONS (Corp Rep)*

03/08/2022  OTHER  
*EXHIBIT B TO DEFENDANTS' RESPONSE TO PLAINTIFS' MOTION FOR SANCTIONS (Corp. Rep)*

03/08/2022  ANSWER  
*DEFENDANT'S RESPONSE TO PLAINTIF'S MOTION FOR SANCTIONS UNDER RULE 215.4 RELTING TO REQUESTS FOR ADMISSIONS*  
Party: Defendant SHROYER, OWEN  
Party 2: Attorney Blott, Jacquelyn W

03/15/2022  OTHER  
*REQUEST FOR ORDER TO ALLOW MEDIA COVERAGE WITH CONSENT OF PARTIES OR WITNESSES*

03/15/2022 OTHER  
*REQUEST FOR ORDER TO ALLOW MEDIA COVERAGE WITH CONSENT OF PARTIES OR WITNESSES*

03/25/2022  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ALLOWING RECORDING AND BROADCASTING OF COURT PROCEEDINGS*  
Party: Defendant JONES, ALEX E

03/25/2022  MOTION  
*PLAINTIFFS MOTION FOR LEAVE TO AMEND*  
Party 2: Attorney Bankston, Mark DuQuesnay

03/28/2022  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*AGREED ORDER ON PLAINTIFFS MOTION FOR LEAVE TO DESIGNATE EXPERT*  
Party: Defendant JONES, ALEX E

03/28/2022  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER DENYING NORMAN PATTIS MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE*  
Party: Defendant JONES, ALEX E

03/30/2022  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON PLAINTIFFS MOTION FOR LEAVE TO AMEND*

03/30/2022  OTHER  
*PLAINTIFFS' THIRD SUPPLEMENTAL DESIGNATION OF EXPERTS*

04/01/2022  ORDER (Judicial Officer: GAMBLE, MAYA GUERRA)  
*ORDER ON PLAINTIFFS MOTION FOR SANCTIONS REGARDING CORPORATE DEPOSITION*



Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Selina Hamilton

CAUSE NO. D-1-GN-18-001835

NEIL HESLIN,	§	IN DISTRICT COURT OF
<i>Plaintiff</i>	§	
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
ALEX E. JONES, INFOWARS, LLC,	§	
FREE SPEECH SYSTEMS, LLC, and	§	<u>261ST</u> DISTRICT COURT
OWEN SHROYER,	§	
<i>Defendants</i>	§	

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**PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

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Plaintiff NEIL HESLIN files this original petition against Defendants, ALEX JONES, INFOWARS, LLC, FREE SPEECH SYSTEMS, LLC, and OWEN SHROYER, and alleges as follows:

**DISCOVERY CONTROL PLAN**

1. Plaintiff intends to seek a customized discovery control plan under Level 3 of Texas Rule of Civil Procedure 190.4.

**PARTIES**

2. Plaintiff Neil Heslin in an individual residing in the State of Connecticut.

3. Defendant Alex E. Jones is a resident of Austin, Texas. He is the host of radio and web-based news programming, including "The Alex Jones Show," and he owns and operates the website InfoWars.com. Mr. Jones can be served at his place of business, InfoWars, 3019 Alvin Devane Blvd., Suite 300-350, Austin, TX 78741.

4. Defendant InfoWars, LLC is a Texas limited liability company with principal offices located in Austin, Texas. It may be served at the address of its attorney, Eric Taube, at 100 Congress Avenue, 18<sup>th</sup> Floor, Austin, TX 78701.

5. Defendant Free Speech Systems, LLC is a Texas limited liability company with principal offices located in Austin, Texas. It may be served at the address of its registered agent, Eric Taube, at 100 Congress Avenue, 18<sup>th</sup> Floor, Austin, TX 78701.

6. Defendant Owen Shroyer is an individual residing in Travis County. At all times relevant to this suit, Mr. Daniels has been a reporter for InfoWars. Mr. Shroyer can be served at the address of his employer, InfoWars, 3019 Alvin Devane Blvd., Suite 300-350, Austin, TX 78741.

### **JURISDICTION & VENUE**

7. The damages sought in this case exceed the minimum jurisdictional limits of Travis County District Courts.

8. Venue is proper in Travis County, Texas, because a suit for damages for defamation may be brought in the county in which a defendant resided at the time of filing, or the domicile of any corporate defendant, at the election of the plaintiff. *See Tex. Civ. Prac. & Rem. Code §15.017.*

### **FACTUAL BACKGROUND**

9. Plaintiff Neil Heslin is the father of deceased minor J.L., a victim of the December 14, 2012 Sandy Hook Elementary School Shooting.

10. This case arises out of accusations by InfoWars in the summer of 2017 that Plaintiff was lying about whether he actually held his son's body and observed a bullet hole in his head. This heartless and vile act of defamation re-ignited the Sandy Hook "false flag" conspiracy and tore open the emotional wounds that Plaintiff has tried so desperately to heal.

11. This conspiracy theory, which has been pushed by InfoWars and Mr. Jones since the day of the shooting, alleges that the Sandy Hook massacre did not happen, or that it was staged by the government and concealed using actors, and that the parents of the victims are participants in a horrifying cover-up.

12. During the June 18, 2017 profile of Jones for her NBC show *Sunday Night with Megyn Kelly*, Ms. Kelly interviewed Plaintiff about the claims made by Jones in the past, including that "the whole thing was fake" and "a giant hoax."<sup>1</sup> Addressing this hateful lie, Plaintiff told Kelly, "I lost my son. I buried my son. I held my son with a bullet hole through his head."<sup>2</sup>

13. On June 26, 2017, InfoWars' broadcast featured a segment hosted by reporter Owen Shroyer in which Shroyer claimed to have reviewed evidence showing it was impossible for Plaintiff to have held his son and see his injury.

14. During the broadcast, Shroyer said, "The statement [Plaintiff] made, fact-checkers on this have said cannot be accurate. He's claiming that he held his son

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<sup>1</sup> [https://www.realclearpolitics.com/video/2017/06/18/full\\_video\\_megyn\\_kelly\\_interviews\\_alex\\_jones.html](https://www.realclearpolitics.com/video/2017/06/18/full_video_megyn_kelly_interviews_alex_jones.html)

<sup>2</sup> *Id.*

and saw the bullet hole in his head. That is his claim. Now, according to a timeline of events and a coroner's testimony, that is not possible."<sup>3</sup>

15. As support for these defamatory statements, Shroyer played video footage where the local medical examiner informed reporters that the slain students were initially identified using photographs rather than in person.

16. Shroyer also stated, "You would remember if you held your dead kid in your hands with a bullet hole. That's not something you would just misspeak on."<sup>4</sup>

17. Shroyer continued by stating that Plaintiff was "making a pretty extreme claim that would be a very thing vivid in your memory, holding his dead child."<sup>5</sup>

18. "The conspiracy theorists on the internet out there have a lot of questions are that are yet to be answered. You say whatever you want about the event, that's just a fact."<sup>6</sup>

19. At the conclusion of his report, Shroyer stated, "Will there be a clarification from Heslin or Megyn Kelly? I wouldn't hold your breath. [Laugh]. So now they're fueling the conspiracy theory claims. Unbelievable."<sup>7</sup>

20. The underlying point or gist of Shroyer's report is that Plaintiff's version "is not possible" and "cannot be accurate," and that Plaintiff was lying about the circumstances of his son's tragic death for a nefarious and criminal purpose.

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<sup>3</sup> <https://www.infowars.com/zero-hedge-discovers-anomaly-in-alex-jones-hit-piece/>

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

21. Shroyer's report was manifestly false. In addition, a minimal amount of research would have caused any competent journalist not to publish the defamatory accusation. According to contemporary news accounts, the bodies of the victims were released from the medical examiner into the custody of the families.<sup>8</sup> Funerals where the children's bodies were in the custody of their parents were widely reported on by the press.<sup>9</sup>

22. On July 20, InfoWars programming featured a segment hosted by Alex Jones in which Shroyer's report was re-broadcast in full. When introducing the segment, Jones demanded that Plaintiff "clarify" what actually happened.

23. After showing the segment, Jones said he told Shroyer, "I could never find out. The stuff I found was they never let them see their bodies. That's kind of what's weird about this. But maybe they did. So I'm sure it's all real. But for some reason they don't want you to see [Shroyer's segment]."<sup>10</sup>

24. Regarding the Sandy Hook shooting, Jones said, "Can I prove that New Haven [sic] didn't happen? No. So I've said, for years, we've had debates about it, that I don't know. But you can't blame people for asking."<sup>11</sup>

25. Mr. Jones was lying. In the five years following the tragedy, he has repeatedly and unequivocally called the Sandy Hook shooting a hoax.

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<sup>8</sup> <https://patch.com/connecticut/newtown/police-no-motive-emerging-in-newtown-school-shooting>

<sup>9</sup> <http://abcnews.go.com/US/photos/sandy-hook-moment-silence-18026580/image-18045101>;  
[https://www.washingtonpost.com/politics/funerals-for-newtown-massacre-victims-begin/2012/12/17/ffd0a130-486d-11e2-820e-17eefac2f939\\_story.html?utm\\_term=.0ccbbb4af100](https://www.washingtonpost.com/politics/funerals-for-newtown-massacre-victims-begin/2012/12/17/ffd0a130-486d-11e2-820e-17eefac2f939_story.html?utm_term=.0ccbbb4af100)

<sup>10</sup> <https://www.mediamatters.org/blog/2017/07/21/alex-jones-sandy-hook-dad-needs-clarify-whether-he-actually-held-his-son-s-body-and-saw-bullet-hole/217333>

<sup>11</sup> *Id.*

## **BACKGROUND TO INFOWARS' 2017 DEFAMATORY STATEMENTS**

26. In order to appreciate the full defamatory impact and the extent of the mental anguish caused by InfoWars' 2017 statements, it is necessary to understand InfoWars' long history of harassing the Sandy Hook parents with defamatory lies. InfoWars' 2017 statements are but the latest in a series of false, hurtful, and dangerous assertions about Plaintiff and the parents of the other victims.

27. In 2013, Jones called the shooting "staged" and said, "It's got inside job written all over it."<sup>12</sup>

28. In March 2014, Jones said, "Folks, we've got video of Anderson Cooper with clear blue-screen out there. [Shaking head]. He's not there in the town square. We got people clearly coming up and laughing and then doing the fake crying. We've clearly got people where it's actors playing different parts for different people, the building bulldozed, covering up everything. Adam Lanza trying to get guns five times we're told. The witnesses not saying it was him...I've looked at it and undoubtedly, there's a cover-up, there's actors, they're manipulating, they've been caught lying, and they were pre-planning before it and rolled out with it."<sup>13</sup>

29. In May 2014, InfoWars published an article titled: "CONNECTICUT TRIES TO HIDE SANDY HOOK TRUTH."<sup>14</sup>

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<sup>12</sup> <https://www.mediamatters.org/blog/2013/04/15/alex-jones-on-boston-blasts-us-govt-is-prime-su/193635>; <https://www.mediamatters.org/embed/clips/2016/11/29/51289/gcn-alexjones-20130409-sandyhook>

<sup>13</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51283/gcn-alexjones-20140314-shooting>

<sup>14</sup> <https://www.infowars.com/connecticut-tries-to-hide-sandy-hook-truth/>

30. In September 2014, InfoWars published an article titled: "FBI SAYS NO ONE KILLED AT SANDY HOOK."<sup>15</sup>

31. In December 2014, Jones said on his radio program, "The whole thing is a giant hoax. How do you deal with a total hoax? It took me about a year, with Sandy Hook, to come to grips with the fact that the whole thing was fake. I did deep research."<sup>16</sup>

32. In the same December 2014 broadcast, Jones continued: "The general public doesn't know the school was actually closed the year before. They don't know they've sealed it all, demolished the building. They don't know that they had the kids going in circles in and out of the building as a photo-op. Blue screen, green screens, they got caught using."<sup>17</sup>

33. Jones made similar comments in January 2015, stating on InfoWars: "You learn the school had been closed and re-opened. And you've got video of the kids going in circles, in and out of the building, and they don't call the rescue choppers for two hours, and then they tear the building down, and seal it. And they get caught using blue-screens, and an email by Bloomberg comes out in a lawsuit, where he's telling his people get ready in the next 24 hours to capitalize on a shooting. Yeah, so Sandy Hook is a synthetic, completely fake with actors, in my view, manufactured. I couldn't believe it at first. I knew they had actors there, clearly, but I thought they killed some real kids. And it just shows how bold they are

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<sup>15</sup> <https://www.infowars.com/fbi-says-no-one-killed-at-sandy-hook/>

<sup>16</sup> [https://www.realclearpolitics.com/video/2017/06/18/full\\_video\\_megyn\\_kelly\\_interviews\\_alex\\_jones.html](https://www.realclearpolitics.com/video/2017/06/18/full_video_megyn_kelly_interviews_alex_jones.html)

<sup>17</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51292/gcn-alexjones-20141228-sandyhook>

that they clearly used actors. I mean they even ended up using photos of kids killed in mass shootings here in a fake mass shooting in Turkey, or Pakistan. The sky is now the limit.”<sup>18</sup>

34. Mr. Jones’ statement about Pakistan refers to a conspiracy theory Jones helped spread involving deceased minor child N.P., a Sandy Hook victim whose photograph appeared at vigil for children slain a school attack in Peshawar. On the day of the Peshawar incident, a Pakistani woman created a collage of photographs of young people killed in school attacks and posted it to Facebook with the caption “They Went to School and Never Came Back.”<sup>19</sup> Because the Peshawar shooting occurred very close to the anniversary of the Sandy Hook massacre, she included a picture of a child from the latter event, along with pictures of Peshawar victims.<sup>20</sup> That collage was then printed out and cut up into the individual photographs displayed by mourners at a vigil for the Peshawar victims.<sup>21</sup>

35. In the same month, January of 2015, InfoWars published an article titled: “MYSTERY: SANDY HOOK VICTIM DIES (AGAIN) IN PAKISTAN.”<sup>22</sup> The article states: “A large-scale attack on a school in Peshawar, Pakistan, last month left 132 school children and 10 teachers dead. Among the alleged victims emerged the familiar face of [deceased minor N.P.], one of the children supposedly killed in the December 2012 Sandy Hook school shooting in Newtown, Connecticut.” InfoWars’

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<sup>18</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51290/gcn-alexjones-20150113-shooting>

<sup>19</sup> <https://www.snopes.com/fact-check/info-boors/>

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> <https://www.infowars.com/mystery-sandy-hook-victim-dies-again-in-pakistan/>



story was meant to reinforce Mr. Jones' persistent lie that N.P. and the other victims of the shooting, such as Plaintiff's son J.L., are not real.

36. In July 2015, Mr. Jones stated on InfoWars: "But you've got green-screen with Anderson Cooper, where I was watching the video, and the flower and plants were blowing in some of them, and then they blow again the same way. It's looped. And then his nose disappears. I mean, it's fake. The whole thing is...I don't know what happened. It's kind of like if you see a hologram at Disney World in the Haunted House. You know? I don't know how they do it, but it's not real. When you take your kids to see the Haunted House and ghosts are flying around, it's not real, folks. It's staged. I mean, a magician grabs a rabbit out of his hat. I know he's got a box under the table that he reaches in and gets the rabbit. I don't know what the trick is here. I've got a good suspicion. But when you've got Wolfgang Halbig...He believed it was real. People called him. He went and investigated. No paperwork, no nothing. It's bull. And now an FBI retired agent, who retired, you know, with decorations. I mean, [InfoWars reporter Rob] Dew, this unprecedented."<sup>23</sup>

37. In the same month, InfoWars published an article titled: "MEGA MASSIVE COVER UP: RETIRED FBI AGENT INVESTIGATES SANDY HOOK."<sup>24</sup>

38. In January of 2016, Florida resident Lucy Richards left threatening voicemail messages and sent violent emails to Leonard Pozner, a fellow Sandy Hook parent and personal friend of Plaintiff Neil Heslin. The threats included messages

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<sup>23</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51284/gcn-alexjones-20150707-shooting>

<sup>24</sup> <https://www.infowars.com/mega-massive-cover-up-retired-fbi-agent-investigates-sandy-hook/>

stating: “you gonna die, death is coming to you real soon” and “LOOK BEHIND YOU IT IS DEATH.”<sup>25</sup> When Richards was later sentenced, Senior U.S. District Judge James Cohn stated: “I’m sure [Leonard Pozner] wishes this was false, and he could embrace [N.P.], hear [N.P.’s] heartbeat and hear [N.P.] say ‘I love you, Dad’...Your words were cruel and insensitive. This is reality and there is no fiction. There are no alternative facts.”<sup>26</sup> As part of her sentence, Ms. Richards will not be permitted to access a list of conspiracy-based websites upon her release, including InfoWars.<sup>27</sup> Ms. Richard’s arrest and sentencing are an ominous reminder to the Plaintiff of the danger posed by InfoWars’ continuing lies about Sandy Hook.

39. In November 2016, Mr. Jones appeared on InfoWars and ranted about false Sandy Hook claims for twenty minutes.<sup>28</sup>

40. During the November 2016 video broadcast, Mr. Jones stated: “That shows some kind of cover-up happening. And then I saw Anderson Cooper -- I’ve been in TV for twenty-something years, I know a blue-screen or a green-screen -- turn and his nose disappeared. Then I saw clearly that they were using footage on the green-screen looped, because it would show flowers and other things during other broadcasts that were moving, and then basically cutting to the same piece of

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<sup>25</sup> <https://www.nbcnews.com/news/us-news/conspiracy-theorist-arrested-death-threats-against-sandy-hook-parent-n693396>

<sup>26</sup> <http://www.nydailynews.com/news/crime/judge-hands-sandy-hook-truther-prison-sentence-article-1.3229754>

<sup>27</sup> <https://www.buzzfeed.com/claudiakoerner/a-conspiracy-theorist-will-serve-time-for-threatening-a>

<sup>28</sup> <https://www.youtube.com/watch?v=MwudDfz1yAk>

footage...Then we see footage of one of the reported fathers of the victims, Robbie Parker, doing classic acting training.”<sup>29</sup>

41. The gist of these statements was that the Sandy Hook parents, including Plaintiff Neil Heslin, are participating in a sinister manipulation plan to fool the public.

42. During the November 2016 broadcast, Jones played video footage of Anderson Cooper interviewing Sandy Hook parent Veronique De La Rosa, at which point Jones stated: “We point out clear chromakey, also known as blue-screen or greenscreen being used, and we’re demonized. We point out that they’re clearly doing fake interviews.”<sup>30</sup> This false statement was likewise used to support Mr. Jones’ vicious lie.

43. Towards the end of the November 2016 broadcast, Mr. Jones stated: “Why should anybody fear an investigation? If they have nothing to hide? In fact, isn’t that in Shakespeare’s Hamlet? Methinks you protest too much...This particular case, they are so scared of investigation. Everything they do ends up blowing up in their face, so guys are going to get what you want now. I’m going to start re-investigating Sandy Hook and everything else that happened with it.”<sup>31</sup>

44. Mr. Jones concluded the video by stating: “So, if children were lost at Sandy Hook, my heart goes out to each and every one of those parents. And the people who say they’re parents that I see on the news. The only problem is, I’ve

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<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

watched a lot of soap operas. And I've seen actors before. And I know when I'm watching a movie and when I'm watching something real."<sup>32</sup>

45. The November 2016 video broadcast was entitled, "Alex Jones Final Statement on Sandy Hook." It was Plaintiff's hope that the title was accurate, and that Mr. Jones would finally end his reckless attacks on the Sandy Hook parents and his assertions that they were liars and actors engaged in a fraud on the American people.

46. As horrifying as the November 2016 broadcast was, its promise of being the "Final Statement" gave hope to Plaintiff that his harassment and defamation by Mr. Jones might be coming to an end after four long years.

47. Those hopes were soon dashed. Instead, InfoWars made continuing defamatory comments in 2017 as outlined above.

48. Mr. Jones also made additional comments in April of 2017 which repeated the claims which form the rickety structure of Mr. Jones' colossal lie about Sandy Hook, including the allegation that fellow Sandy Hook parent Veronique De La Rosa conducted a fake interview with Anderson Cooper to hide the truth, while telling his viewers not to "believe any of it."<sup>33</sup>

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<sup>32</sup> *Id.*

<sup>33</sup> <https://www.youtube.com/watch?v=rUn1jKhWTXI>

49. On June 18, 2017, Mr. Jones made additional comments when interviewed by Megyn Kelly, during which he stated: "I do think there's some cover-up and some manipulation."<sup>34</sup> The following exchange took place:

MEGYN KELLY: But Alex, the parents, one after the other, devastated. The dead bodies that the coroner autopsied ...

ALEX JONES: And they blocked all that. And they won't release any of it. That's unprecedented.<sup>35</sup>

50. Jones and Kelly also had the following exchange:

JONES: But then what do you do, when they've got the kids going in circles, in and out of the building with their hands up? I've watched the footage. And it looks like a drill.

MEGYN KELLY: When you say, "parents faked their children's death," people get very angry.

ALEX JONES: Yeah, well, that's - oh, I know. But they don't get angry about the half million dead Iraqis from the sanctions. Or they don't get angry about all the illegals pouring in.<sup>36</sup>

51. Shortly following the Megyn Kelly interview, on June 26, 2017, InfoWars reporter Owen Shroyer made the defamatory statements referenced above.

52. As such, the broadcasts made by InfoWars on June 26, 2017 and July 20, 2017 defaming Mr. Heslin did not occur in isolation. Rather, the statements were a continuation and elaboration of a years-long campaign to falsely attack the

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<sup>34</sup> [https://www.realclearpolitics.com/video/2017/06/18/full\\_video\\_megyn\\_kelly\\_interviews\\_alex\\_jones.html](https://www.realclearpolitics.com/video/2017/06/18/full_video_megyn_kelly_interviews_alex_jones.html)

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

honesty of the Sandy Hook parents, casting them as participants in a ghastly conspiracy and cover-up.

53. By making renewed accusations about Plaintiff in 2017, InfoWars breathed new life into this conspiracy and caused intense emotional anguish and despair. For that reason, Plaintiff brings this suit against Defendants.

### **CAUSE OF ACTION**

#### **I. Defamation and Defamation *Per Se***

54. All previous allegations are incorporated by reference.

55. Plaintiff is a private individual and is neither a public official nor a public figure.

56. The June 26, 2017 and July 20, 2017 broadcasts by Defendants were false, both in their particular facts and in the main point, essence, or gist in the context in which they were made.

57. The June 26, 2017 and July 20, 2017 broadcasts by Defendants, while defamatory in their own right, were also continuations and elaborations of an underlying defamatory assertion which Defendants have advanced since 2013, namely that Plaintiff has lied to the American people about the death of his son and has participated in a horrifying criminal cover-up.

58. In viewing the June 26, 2017 and July 20, 2017 broadcasts, a reasonable member of the public would be justified in inferring that the publications implicated the Plaintiff.

59. The June 26, 2017 and July 20, 2017 broadcasts were also defamatory because they are reasonably susceptible to a defamatory meaning by innuendo. A reasonable person, reviewing the statements in question, could conclude the Plaintiff was being accused of engaging in fraudulent or illegal activity. In context, the gist of the statements could be construed as defamatory to the Plaintiff by an average member of general public.

60. Defendants' defamatory publications were designed to harm Plaintiff's reputation and subject the Plaintiff to public contempt, disgrace, ridicule, or attack.

61. Defendants acted with actual malice. Defendants' defamatory statements were knowingly false or made with reckless disregard for the truth or falsity of the statements at the time the statements were made.

62. Defendants' defamatory statements were not privileged.

63. Defendants' defamatory statements constitute defamation *per se*. The harmful nature of the defamatory statements is self-evident. The defamatory statements implicate the Plaintiff in heinous criminal conduct. False implications of criminal conduct are the classic example of defamation *per se*.

64. Defendants publicly disseminated the defamatory publications to an enormous audience causing significant damages to the Plaintiff.

65. Defendants' defamatory publications have injured Plaintiff's reputation and image, and they have exposed Plaintiff to public and private hatred, contempt, and ridicule.

66. In light of their prior experience with these kind of reckless statements, Defendants knew that their publication could cause Plaintiff to suffer harassment and potential violence.

67. Defendants' defamatory publications have and will continue to cause harm to Plaintiff. Due to Defendants' conduct, the Plaintiff has suffered and continues to suffer substantial damages in an amount to be proven at trial.

### **III. Conspiracy**

68. All previous allegations are incorporated by reference.

69. Defendants acted together, as a cabal, to accomplish their campaign of defamation. Defendants had a meeting of the minds on the object or course of action underlying their pattern of recklessly defamatory publications.

70. As a result of this meeting of the minds, Defendants collectively committed the unlawful overt acts detailed above.

71. Defendants are jointly and severally liable for the injuries Mr. Heslin suffered due to Defendants' wrongful actions.

### **IV. Respondeat Superior**

72. All previous allegations are incorporated by reference.

73. When InfoWars employees acted in the manner described in this Petition, they did so as agents of InfoWars and within the scope of their authority from Mr. Jones.



74. InfoWars and Alex Jones are liable for the damages proximately caused by the conduct of employees and agents, including Owen Shroyer, pursuant to the doctrine of *respondeat superior*.

### **DAMAGES**

75. Plaintiff has suffered general and special damages, including a severe degree of mental stress and anguish which has disrupted his daily routine and caused a high degree of psychological pain.

76. Plaintiff has also suffered damage to his reputation and image, both up to the present and into the future.

77. Because Defendants' conduct amounts to defamation *per se*, Plaintiff is also entitled to an award of presumed damages.

78. Plaintiff is also entitled to an award of nominal damages and a judgment clearing his name.

79. Plaintiff is also entitled to exemplary damages because the Defendants acted with malice.

80. Plaintiff is also entitled to pre-judgment and post-judgment interest, costs of court, and attorney's fees.

81. Pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiff is seeking relief in excess of \$1,000,000.

**JURY DEMAND**

82. Plaintiff demands a jury trial and tenders the appropriate fee with this petition.

**REQUEST FOR DISCLOSURE**

83. Plaintiff requests that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

**PRAYER**

WHEREFORE PREMISES CONSIDERED, Plaintiff Neil Heslin asks that the Court issue citation for each Defendant to appear and answer, and that Plaintiff be awarded all the damages set forth above, and to grant whatever further relief to which Plaintiff is justly entitled.

Respectfully submitted,

**KAster LYNCH FARRAR & BALL, LLP**



MARK D. BANKSTON

State Bar No. 24071066

KYLE W. FARRAR

State Bar No. 24034828

WILLIAM R. OGDEN

State Bar No. 24073531

1010 Lamar, Suite 1600

Houston, Texas 77002

713.221.8300 Telephone

713.221.8301 Fax

CAUSE NUMBER (FOR CLERK USE ONLY): \_\_\_\_\_ COURT (FOR CLERK USE ONLY): \_\_\_\_\_

STYLED NEIL HESLIN VS. ALEX E. JONES, INFOWARS, LLC, FREE SPEECH SYSTEMS, LLC, and OWEN SHROYER

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:		Person or entity completing sheet is:
Name:	Email:	Plaintiff(s)/Petitioner(s):	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____	
<u>Mark D. Bankston</u>	<u>mark@fbtrial.com</u>	<u>NEIL HESLIN</u>		
Address:	Telephone:	Defendant(s)/Respondent(s):		
<u>1010 Lamar, Ste. 1600</u>	<u>(713) 221-8300</u>	<u>ALEX E. JONES, INFOWARS, LLC, FREE SPEECH SYSTEMS, LLC, and OWEN SHROYER</u>		
City/State/Zip:	Fax:		Additional Parties in Child Support Case:	
<u>Houston, Texas 77002</u>	<u>(713) 221-8301</u>		Custodial Parent: _____	
Signature:	State Bar No:		Non-Custodial Parent: _____	
<u>/s/ Mark D. Bankston</u>	<u>24034828</u>		Presumed Father: _____	
		[Attach additional page as necessary to list all parties]		
2. Indicate case type, or identify the most important issue in the case (select only 1):				
Civil			Family Law	
Contract	Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)
<i>Debt/Contract</i> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____  <i>Foreclosure</i> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____ <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	<input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____  <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input type="checkbox"/> With Children <input type="checkbox"/> No Children  <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order  <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____
Employment	Other Civil			
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____			
Tax	Probate & Mental Health			
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	<i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____			
3. Indicate procedure or remedy, if applicable (may select more than 1):				
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
4. Indicate damages sought (do not select if it is a family law case):				
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000				

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Kirby Hernandez



TEXAS | FLORIDA

April 23, 2018

*Via E:File*

Travis County District Clerk  
1000 Guadalupe Street  
Austin, Texas 78701

Re: Cause No. D-1-GN-18-001835, *Neil Heslin vs., Alex E. Jones, InfoWars, LLC, Free Speech Systems, LLC, and Owen Shroyer*, In the 261<sup>st</sup> Judicial District Court of Travis County, Texas.

Dear Clerk,

Please accept this correspondence as a request for citations in the above cited cause of action. Additionally, I would request that the citations be delivered to the e-mail address of [eric@fbtrial.com](mailto:eric@fbtrial.com).

Thank you for your time and assistance in this matter.

Most sincerely,

A handwritten signature in black ink, appearing to read "Mark Bankston".

Mark Bankston

**CIVIL PROCESS REQUEST**

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING  
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

**CASE NUMBER:** D-1-GN-18-001835 **CURRENT COURT:** 261ST District Court, Travis County

**TYPE OF INSTRUMENT TO BE SERVED** (See Reverse For Types): Original Petition

**FILE DATE OF MOTION:** April 16, 2018  
Month/ Day/ Year

**SERVICE TO BE ISSUED ON** (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Alex E. Jones

ADDRESS: 3019 Alvin Devane Blvd., Ste. 300-350, Austin, Texas 78701

AGENT, (if applicable): \_\_\_\_\_

**TYPE OF SERVICE/PROCESS TO BE ISSUED** (see reverse for specific type): \_\_\_\_\_

**SERVICE BY** (check one):

☐ ATTORNEY PICK-UP ☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Lexitas Legal Phone: 713-375-0121

☐ MAIL ☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or

☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_

☐ OTHER, explain \_\_\_\_\_

\*\*\*\*\*

\*\*\*\*

2. NAME: InfoWars, LLC

ADDRESS: \_\_\_\_\_

AGENT, (if applicable): Eric Taube, 100 Congress Avenue, 18th Floor, Austin, Texas 78701

**TYPE OF SERVICE/PROCESS TO BE ISSUED** (see reverse for specific type): \_\_\_\_\_

**SERVICE BY** (check one):

☐ ATTORNEY PICK-UP ☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Lexitas Legal Phone: 713-375-0121

☐ MAIL ☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or

☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_

☐ OTHER, explain \_\_\_\_\_

**ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:**

NAME: Mark D. Bankston TEXAS BAR NO./ID NO. 24034828

MAILING ADDRESS: 1010 Lamar, Ste. 1600

PHONE NUMBER: 713 221-8300 FAX NUMBER: 713 221-8301  
area code phone number area code fax number

EMAIL ADDRESS: mark@fbtrial.com

**CIVIL PROCESS REQUEST**

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING  
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: D-1-GN-18-001835CURRENT COURT: 261st District Court, Travis CountyTYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Original PetitionFILE DATE OF MOTION: April 16, 2018

Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Free Speech Systems, LLC

ADDRESS: \_\_\_\_\_

AGENT, (if applicable): Eric Taube, 100 Congress Avenue, 18th Floor, Austin, Texas 78701

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

☐ ATTORNEY PICK-UP☐ CONSTABLE☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Lexitas LegalPhone: 713-375-0121☐ MAIL☐ CERTIFIED MAIL☐ PUBLICATION:Type of Publication: ☐ COURTHOUSE DOOR, or☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_☐ OTHER, explain \_\_\_\_\_

\*\*\*\*\*

\*\*\*\*

2. NAME: Owen ShroyerADDRESS: 3019 Alvin Devane Blvd., Ste. 300-350, Austin, Texas 78741

AGENT, (if applicable): \_\_\_\_\_

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

☐ ATTORNEY PICK-UP☐ CONSTABLE☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Lexitas LegalPhone: 713-375-0121☐ MAIL☐ CERTIFIED MAIL☐ PUBLICATION:Type of Publication: ☐ COURTHOUSE DOOR, or☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_☐ OTHER, explain \_\_\_\_\_**ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:**NAME: Mark D. BankstonTEXAS BAR NO./ID NO. 24034828MAILING ADDRESS: 1010 Lamar, Ste. 1600PHONE NUMBER: 713

area code

221-8300

phone number

FAX NUMBER: 713

area code

221-8301

fax number

EMAIL ADDRESS: mark@fbtrial.com

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Terri Juarez

NO. D-1-GN-18-001835

NEIL HESLIN,	§	IN THE DISTRICT COURT OF
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
ALEX E. JONES, INFOWARS, LLC,	§	
FREE SPEECH SYSTEMS, LLC, and	§	
OWEN SHROYER,	§	
<i>Defendants</i>	§	261 <sup>st</sup> JUDICIAL DISTRICT

**DEFENDANTS' ORIGINAL ANSWER**

COMES NOW, Defendants Alex Jones, Infowars, LLC, Free Speech Systems, LLC, and Owen Shroyer (collectively, the "Defendants"), hereby file this Original Answer and show the Court the following:

**I.**

**GENERAL DENIAL**

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendants generally deny each and every, all and singular, the material allegations contained in Plaintiff's Original Petition and demand strict proof thereof by a preponderance of the evidence.

**II.**

**AFFIRMATIVE AND OTHER DEFENSES**

Pursuant to Rule 94 of the Texas Rules of Civil Procedure, Defendants plead the following:

2.01 For further answer if need be, Defendants allege that Plaintiff's claims are barred by the Statute of Limitations.

2.02 For further answer if need be, Defendants allege that Plaintiff's claims are

barred because the alleged defamatory claims/broadcasts constitute Defendants' opinions.

**III.**

**RELIEF REQUESTED**

WHEREFORE, PREMISES CONSIDERED, Defendants pray that Plaintiff take nothing by his suit and that Defendants be allowed to go hence without day and with all costs and that the Court grant such other and further relief, at law or in equity, to which Defendants may prove themselves to be justly entitled and for which they will ever pray.

GLAST, PHILLIPS & MURRAY, P.C.

/s/ Preston C. Enoch

Mark C. Enoch

State Bar No. 06630360

Preston C. Enoch

State Bar No. 24097657

GLAST, PHILLIPS & MURRAY, P.C.

14801 Quorum Drive, Suite 500

Dallas, Texas 75254-1449

Telephone: 972-419-8366

Facsimile: 972-419-8329

[fly63rc@verizon.net](mailto:fly63rc@verizon.net)

[penoch@gpm-law.com](mailto:penoch@gpm-law.com)

ATTORNEYS FOR DEFENDANTS



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the parties listed below via email and via efile.txcourts.gov's e-service system on June 18, 2018:

Mark Bankston  
Kyle Farrar  
Kaster, Lynch, Farrar & Ball, LLP.  
1010 Lamar, Suite 1600  
Houston, Texas 77002

/s/ Mark C. Enoch  
Mark C. Enoch

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Sandra Henriquez

**GLAST, PHILLIPS & MURRAY**  
A PROFESSIONAL CORPORATION

**MARK C. ENOCH, J.D., M.B.A.**  
(972) 419-8366  
[fly63rc@verizon.net](mailto:fly63rc@verizon.net)

BOARD CERTIFIED – CIVIL TRIAL LAW  
TEXAS BOARD OF LEGAL  
SPECIALIZATION

14801 QUORUM DRIVE, SUITE 500  
DALLAS, TEXAS 75240-6657

(972) 419-8300  
FACSIMILE (469) 206-5022

June 27, 2018

*Via e filing*

Clerk, 261st District Court  
Travis County  
1000 Guadalupe, 5th floor  
Austin, TX 78701

Re: **Vacation/Unavailability Letter;** *Neil Heslin v. Alex E. Jones, Infowars, LLC, Free Speech Systems, LLC and Owen Shroyer*; Cause No. D-1-GN-18-001835, 261st District Court, Travis County, Texas

Dear Clerk:

I will be on vacation/unavailable on the following dates:

July 14 – August 1  
August 12 – August 22

Please do not schedule any hearings or court trial dates during this time-frame. By copy of this letter I am requesting that opposing counsel not schedule any hearings or depositions during this time period as well. Thank you for your attention to this matter.

Very truly yours,

*/s/ Mark C. Enoch*

Mark C. Enoch

MCE:mji

cc: Mr. Mark D. Bankston (*via e-service*)



Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Sandra Henriquez

June 28, 2018

*Via E:File*

261<sup>st</sup> District Clerk  
Travis County, Texas  
1000 Guadalupe Street  
Austin, Texas 78701

Re: **Vacation/Unavailability Letter**; Cause No. D-1-GN-18-001835, *Neil Heslin vs., Alex E. Jones, InfoWars, LLC, Free Speech Systems, LLC, and Owen Shroyer*, In the 261<sup>st</sup> Judicial District Court of Travis County, Texas.

Dear Sir or Madam:

I will be on vacation/unavailable on the following dates:

August 2, 2018, through August 10, 2018.

Please do not schedule any hearings or court trial dates during this time frame. By copy of this letter, I am requesting that opposing counsel not schedule any hearings or depositions during this time-period as well. Thank you for your attention to this matter.

Most sincerely,

A handwritten signature in black ink, appearing to read "Mark Bankston".

Mark Bankston

cc: **BY ELECTRONIC TRANSMISSION:** [fly63rc@verizon.net](mailto:fly63rc@verizon.net)  
Mr. Mark C. Enoch  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Ste. 500  
Dallas, Texas 75254

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Hector Gaucin-Tijerina

**GLAST, PHILLIPS & MURRAY**  
A PROFESSIONAL CORPORATION

**MARK C. ENOCH, J.D., M.B.A.**  
(972) 419-8366  
[fly63rc@verizon.net](mailto:fly63rc@verizon.net)

BOARD CERTIFIED – CIVIL TRIAL LAW  
TEXAS BOARD OF LEGAL  
SPECIALIZATION

14801 QUORUM DRIVE, SUITE 500  
DALLAS, TEXAS 75240-6657

(972) 419-8300  
FACSIMILE (469) 206-5022

June 29, 2018

*Via efilng*

Clerk, 261st District Court  
Travis County  
1000 Guadalupe, 5th floor  
Austin, TX 78701

Re: **Amended Vacation/Unavailability Letter; Neil Heslin v. Alex E. Jones, Infowars, LLC, Free Speech Systems, LLC and Owen Shroyer; Cause No. D-1-GN-18-001835, 261st District Court, Travis County, Texas**

Dear Clerk:

I will be on vacation/unavailable on the following dates:

July 14 – August 1  
August 12 – August 26

Please do not schedule any hearings or court trial dates during this time-frame. By copy of this letter I am requesting that opposing counsel not schedule any hearings or depositions during this time period as well. Thank you for your attention to this matter.

Very truly yours,

*/s/ Mark C. Enoch*

Mark C. Enoch

MCE:mji

cc: Mr. Mark D. Bankston (*via e-service*)

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-18-001835  
Raeana Vasquez

**GLAST, PHILLIPS & MURRAY**  
A PROFESSIONAL CORPORATION

**MARK C. ENOCH, J.D., M.B.A.**  
(972) 419-8366  
[fly63rc@verizon.net](mailto:fly63rc@verizon.net)

BOARD CERTIFIED – CIVIL TRIAL LAW  
TEXAS BOARD OF LEGAL  
SPECIALIZATION

14801 QUORUM DRIVE, SUITE 500  
DALLAS, TEXAS 75240-6657

(972) 419-8300  
FACSIMILE (469) 206-5022

June 29, 2018

*Via efilng*

Clerk, 261st District Court  
Travis County  
1000 Guadalupe, 5th floor  
Austin, TX 78701

Re: *Neil Heslin v. Alex E. Jones, Infowars, LLC, Free Speech  
Systems, LLC and Owen Shroyer*; Cause No. D-1-GN-18-  
001835, 261st District Court, Travis County, Texas

Dear Clerk:

The Court's online docket for this case indicates that Preston Enoch is the counsel of record for defendants in the captioned case. Preston Enoch is no longer part of the Glast, Phillips & Murray, P.C. firm or associated with this case. We request that you correct your records to reflect that the undersigned, Mark Enoch with Glast, Phillips & Murray, P.C., is counsel for all defendants.

Thank you for your attention to this request.

Very truly yours,

*/s/ Mark C. Enoch*

Mark C. Enoch

MCE:mji

cc: Mr. Mark D. Bankston (*via e-service*)